

**LAGOMARSINO LAW**

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JAVIER MOLINA, an individual,

Plaintiff,

vs.

CURRENT, LLC, a domestic limited-liability  
company,

Defendant.

CASE NO. 2:25-cv-00204-MDC

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED between the parties and their undersigned attorneys that the discovery cut-off date of September 22, 2025, be continued for a period of ninety (90) days from the Court's prior Order (ECF No. 25), for the purpose of allowing the parties to complete written discovery, complete the depositions of the parties, experts, and lay witnesses, and any other discovery the parties wish to conduct.

**I. DISCOVERY COMPLETED TO DATE**

- Defendant served its notice of subpoena for documents to Nevada Department of Employment, Training & Rehabilitation (Nevada Equal Rights Commission) on April 21, 2025.
- Plaintiff and Defendant served their initial disclosures on April 28, 2025. On May 2, 2025, Defendant served its first supplemental disclosures.
- Defendant served its first set of Interrogatories, Request for Production of Documents and Requests for Admission to Plaintiff on June 16, 2025. Additionally, Defendant served its second supplemental disclosures on the same date.

- Plaintiff served the first set of Requests for Production of Documents on June 27, 2025.
- Plaintiff served his responses to the first set of Interrogatories, Requests for Production of Documents, Requests for Admission to Defendant, and first supplemental disclosures on July 23, 2025.
- Then on July 24, 2025, Plaintiff served his initial expert disclosures.
- On August 11, 2025, Defendant served its response to the first set of Requests for Production of Documents to Plaintiff.
- Plaintiff served his notice of taking the videotaped deposition of Eddie Molnar on August 21, 2025.

## **II. DISCOVERY YET TO BE COMPLETED**

The Parties have yet to complete the following discovery (individual or 30(b)(6) designees);

- the depositions of the named parties;
- the depositions of fact witnesses;
- expert witness depositions;
- additional written discovery which may include written discovery to one another and/or additional subpoenas to third parties; and
- Any additional discovery the parties wish to conduct.

The Parties reserve the right to conduct additional discovery that is permitted by the Federal Rules of Civil Procedure.

## **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

While the parties have been diligent in conducting discovery in this matter, the following issues have been unavoidable:

The Parties have yet to conduct any depositions for the case and had issues with scheduling dates including Plaintiff, Eddie Molnar, and Current, LLC 30(b)(6). Following the depositions, the Parties anticipate to serve additional discovery to gather further information which is believed to help include facts to the case.

As such, the Parties stipulate to and request that the Court order an extension of deadlines in order to account for this delay.

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## IV. PROPOSED EXTENDED DEADLINES

	<u>Current</u>	<u>Proposed</u>
<b>Discovery cut-off</b>	09/22/25	Monday, December 22, 2025 <sup>1</sup>
<b>Deadline to file dispositive motions</b>	10/22/25	Tuesday, January 20, 2026
<b>Pre-trial order deadline</b>	11/21/25	Thursday, February 19, 2026

This request for an extension is made in good faith and joined by all the parties in this case. The Request is timely pursuant to LR 26-3. Trial is not yet set in this matter and dispositive motions have not yet been filed. Accordingly, this extension will not delay this case. Since this request is a joint request, no party will be prejudiced.

The extension will allow the parties the necessary time to complete discovery.

**IT IS SO STIPULATED AND AGREED.**

DATED this 29th day of August, 2025.

DATED this 29th day of August, 2025.

**LAGOMARSINO LAW****KAMER ZUCKER ABBOTT**/s/ Maria A. Mencos, Esq./s/ R. Todd Creer, Esq.

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*Attorneys for Defendant Current, LLC***IT IS SO ORDERED.**

By:   
 UNITED STATES MAGISTRATE JUDGE  
 9-2-25

<sup>1</sup> This deadline falls on December 21, 2025, which is a Sunday. As a result, this deadline extends to the next court day of Monday, December 22, 2025, by operation of FRCP 6.